

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SAMUEL TURNER POOLE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 99-635-SLR
	)	
STAN TAYLOR, and	)	
RAPHAEL WILLIAMS,	)	Jury Trial Demanded
	)	
	)	
Defendants.	)	

**STATE DEFENDANT RAPHAEL WILLIAM'S RESPONSE TO PLAINTIFF'S  
REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, State Defendant, Raphael Williams and hereby responds to  
*Plaintiff's*<sup>1</sup> *Production of Documents* as follows:

1. Any and all suits filed against the state for placing inmates on the floor followed by any of Complaints in the state at the other three prisons Smyrna and Georgetown and Gander Hill.

**RESPONSE:** Objection: Defendant Williams has no such recordkeeping data base available to retrieve the requested information.

1. A total of all inmates that was being held in all your prisons total capacity each separated Smyrna, Georgetown and Gander Hill.

**RESPONSE:** Objection. No time frames referenced. Defendant Williams has no personal knowledge of Smyrna and Georgetown prison populations.

2. I want to see when that prison was open and when it was single and then

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<sup>1</sup> Each Request for Production of Documents is entered as presented to the Defendants by the Plaintiff in its entirety. The responding defendant has not altered the sentence structure or made grammatical or spelling corrections.

you doubled and tripled, with everything that was done to approve this and by whom this was done and the build coders and who approved this.

**RESPONSE:** Objection. The request is incoherent.

4. I want all Complaints that was filed about how cold it was during the winter month and summer how cold it was sleeping on the floor and in the cell.

**RESPONSE:** Objection. No time frames referenced. Without waiving said objection Defendant Williams does not know what type of complaints are being referenced. There is no record of oral complaints and written complaints are not maintained or indexed by this subject matter topic.

5. All medical records containing to the July 6, 1999 incident report filed by everybody and even Medical Staff and Guards.

**RESPONSE:** Objection. Incoherent. Defendant Williams does not know what incident report is being referenced, and medical record storage is unrelated to incident reports.

6. I want to see all reports containing to you at Gander Hill fixing that sink 1 year before and approximately 6 months after, with Grievance filed.

**RESPONSE:** Objection. This request is unintelligible as presented.

7. I want to see how sentenced inmates was charged and sentence was kept in 2 man cell at Gander Hill.

**RESPONSE:** Objection. The request is incoherent as presented.

8. I want to see all complaints entered and all the people came to that building to check on the Fitness Center with how many inmates that was kept in the gym.

**RESPONSE:** Objection. Incoherent. No record is made of persons who come to the building to check the fitness center.

9. I want to see the license of the Dr. you had stitch me up on July 6, 1999, and all suits filed against Gander Hill (Mal Practice) for the same Dr.

**RESPONSE:** Objection. Defendant Williams does not have a copy of the Doctor's license.

10. I want all Grievances that was filed about the heat and how cold it was on the first floor all complaints and repairs entered and fixed.

**RESPONSE:** : Objection. Grievances are not filed, maintained or indexed by this subject matter topic.

11. I want all maintenance problems with the Heating System on the first floor.

**RESPONSE:** Objection. Incoherent. Defendant Williams does not understand this request.

12. I want to know during this time kept in the cell at approx. 106% while bleeding. I want to know what the problems why inmates were kept in 106% to where repair only on the inmates section and in the hallways and in the Guards booth it was freezing. I want to see all repairs and complaints to get that air conditioner repaired

**RESPONSE:** Objection. This request is incoherent as presented.

13. Witness all staff working on 1-2 shift that had contact with the inmates and the nurses from July 6, 1999 and DR.

**RESPONSE:** Objection. This request is incoherent as presented.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

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